

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

# UNITED STATES OF AMERICA

§§§§§§§§

Case No. 20-cr-00641-002

**MOHAMMED "MOE" AMER  
FAISAL AL QAYSI,**

*Defendant*

**DEFENDANT MOHAMMED “MOE” AMER FAISAL AL QAYSI’S  
UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING**

TO THE HONORABLE ALFRED H. BENNETT, UNITED STATES DISTRICT JUDGE FOR  
THE SOUTHERN DISTRICT OF TEXAS:

Mohammed "Moe" Amer Faisal Al Qaysi, Defendant in the above-styled and numbered cause, by and through undersigned counsel, respectfully moves this Court for a continuance of the sentencing hearing in this case. In support thereof, he would show the following:

1. Mr. Al Qaysi was charged by superseding indictment on March 3, 2022 with conspiracy to commit wire fraud and false statement in naturalization application. *See* Dkt. [5](#).
  2. On January 16, 2025, Mr. Al Qaysi entered a plea of guilty to Count Four of the superseding indictment pursuant to a plea agreement before this Court. *See* Minute Entry of 1/16/25. This Court subsequently entered an Order for Presentence Investigation and Disclosure & Sentencing Dates. *See* Dkt. [140](#).
  3. The initial PSR was released on March 17, 2025. Dkt. [145](#). Mr. Al Qaysi filed his statement of no objections to the PSR on April 1, 2025. *See* Dkt. [146](#). Sentencing is presently scheduled to take place on April 24, 2025. *See* Dkt. [140](#).
  4. Counsel for Mr. Al Qaysi is scheduled to appear before this Court for sentencing in another

matter the same day that the sentencing hearing is scheduled in this case. Counsel for the Government is presently in trial before Judge Hanen. To afford both parties an adequate opportunity to prepare for the sentencing hearing in this case, Mr. Al Qaysi is requesting to reschedule his sentencing hearing for at least thirty (30) days.

5. Counsel for Mr. Al Qaysi conferred with counsel for the Government to obtain her position on this motion and confirmed that she is not opposed.
6. This motion is made, not for the purpose of delay, but in the best interests of justice. Mr. Al Qaysi is on bond and complying with his conditions of release.

WHEREFORE PREMISES CONSIDERED, Mr. Al Qaysi respectfully requests that this Court grant this motion and enter an order to continue the sentencing hearing.

Respectfully Submitted,

**MAYR LAW, P.C.**

By: /s/ T. Brent Mayr  
T. BRENT MAYR  
Texas State Bar Number 24037052  
[bmayr@mayr-law.com](mailto:bmayr@mayr-law.com)

5300 Memorial Dr., Suite 750  
Houston, TX 77007  
Telephone: 713-808-9613  
Fax: 713-808-9991

*Attorney for Mohammed "Moe" Amer Faisal Al Qaysi*

CERTIFICATE OF CONFERENCE

I certify that I conferred with counsel for the Government, Heather Winter, and confirmed that she is not opposed to this motion.

/s/ T. Brent Mayr  
T. BRENT MAYR

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this notice was sent to Counsel for the Government, as well as Megan Chester, United States Probation Officer, on April 14, 2025, via email.

*/s/ T. Brent Mayr*  
T. BRENT MAYR